



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

Billie G. Saulque
Chairman
Utu Utu Gwaitu Paiute Tribe
567 Yellow Jacket Road
Post Office Box 1
Benton, California 93512

RE: New Indian Environmental General Assistance Program Grant

Application Due: MAY 18 2015

Dear Chairman Saulque:

I am pleased to inform you that your proposal submitted to this office under the U.S. Environmental Protection Agency's Indian Environmental General Assistance Program (GAP) has been tentatively approved for funding. At this time, I am setting aside \$50,000 of funding to support your GAP for one year. An additional \$17,250 has been tentatively set aside for supplemental activities as follows: \$11,250 for a contract bookkeeper and \$6,000 for the Tribal Administrator to supervise the grant. The total tentative award for your GAP is \$67,250.

A General Assistance Program grant may not exceed four years. Your current cooperative agreement will expire on **September 30, 2015**, which is the end of your grant's four year budget and project period. As a reminder, a final Federal Financial Report and final performance report must be submitted by December 30, 2015, which is 90 days after the grant ends.

The Tribe consistently has a considerable GAP grant balance each year. We recommend implementing either a monthly or quarterly system of drawing down grant funds commensurate with the work completed for that period.

Work plan submission, negotiation, and approval will be conducted electronically in GAP Online. The comments attached here for your reference are also available in GAP Online. If we receive your complete application and an **approvable** revised work plan by the due date we will make every effort to award the grant by September 30, 2015. This funding will support work plan activities **from October 1, 201 to September 30, 2016**. Please do not incur any costs under this work plan until the official grant award document has been signed and dated by the EPA Award Official. Any costs incurred before the date of award will not be reimbursed.

This letter does not constitute a grant award. In order to receive funding, the Utu Utu Gwaitu Paiute Tribe will need to complete an Application for Federal Assistance (SF-424). **The complete application, including an updated work plan, must be submitted for EPA review by the due date indicated above.** Materials can be submitted earlier and will be processed on a first-come, first-served

basis. Please note that in completing your application, you will need to enter the GAP Catalog of Federal Domestic Assistance Number (CFDA), required in box #11 on the SF-424A application form, 66.926.

New Process for Submitting Your GAP Grant Application

Effective February 17, 2015, EPA grant applicants **must** use Grants.gov to submit their applications. The Grants.gov registration process can take up to 30 days to complete. Therefore, it is highly recommended that EPA applicants complete their registration on Grants.gov now. Also, your organization's registration in SAM.gov must be active to utilize Grants.gov. If it appears that the grants.gov registration process may prevent you from submitting your application by the due date aforementioned, then please contact Support@grants.gov or call 1-800-518-4726 as support is available 24 hours a day and 7 days a week. You should also notify your Project Officer before the application due date to request an extension.

Please review both Attachment 2 (Grants.gov Instructions Guide) and Attachment 3 (Region 9 Guidance Information for Applicants) or go to <http://www.epa.gov/region9/funding/information.html> to find additional resources on Grants.gov, Federal Regulations, and new EPA requirements. We suggest you forward these materials to your Project Manager, Financial Officer and any other personnel in your organization requiring this information.

I look forward to working with you and your staff under the General Assistance Program. Questions regarding the completion of the application forms as well as the mandatory use of grants.gov should be referred to Linda Struna, Grants Management Specialist, at (415) 972-3723. You can also contact your GAP Project Officer, Damian Willson at (415) 972-3454 if you have questions regarding this letter, the work plan, or the General Assistance Program.

Sincerely,



Laura M. Ebbert
Manager
Tribal Section

Enclosures:

1. Work Plan Comments
2. Component Cost and Work Years Guidance
3. Grants.gov Instructions Guide
4. Region 9 Guidance Information for Applicants

cc: Honovaa Lewis, Environmental Technician (with work plan comments)

GAP 2015-2016 Work Plan Comments

Utu Utu Gwaitu Paiute Tribe

Thank you for developing an outcome-oriented work plan. The following observations and requests were written with the intent of strengthening the Tribe's GAP work plan, identifying possible assistance, and ensuring the work plan meets GAP guidelines. These comments pertain to the 2015-2016 work plan that was submitted with your GAP proposal in GAP Online in December 2014. Please ensure that these comments are addressed in your final GAP work plan in GAP Online.

General Definitions and References

1. The following references are useful for understanding GAP in general, for getting an understanding for environmental outcomes, etc.
2013 Guidance on the Award and Management of General Assistance Program Agreements and Appendix I, Guidebook for Building Tribal Environmental Program Capacity
<http://www.epa.gov/region9/funding/pdfs/tribal-gap/r9-gap-guidance.pdf>
GAP Act (<http://www.epa.gov/Indian/pdfs/4368b.pdf>)
2015 GAP Grant Notification (<http://www.epa.gov/region09/funding/tribal-gap.html>)
EPA Strategic Plan (<http://www2.epa.gov/planandbudget/strategicplan>)
2. Environmental outcomes should be expressed in terms of improvements to public health, the environment, or human behavior. They can also reflect improved tribal capacity to protect public health or the environment. Intermediate outcomes could reflect: a) improved human health or environmental conditions, b) reduced risks to human health or the environment, c) increased tribal capabilities in legal, enforcement, technical, communication, or administrative areas. Long-term outcomes could include attainment of desired environmental conditions (e.g., water quality standards are met) or human health goals, attainment of a desired capacity to plan, develop, implement, manage and sustain tribal environmental programs.
3. Please ensure that each component in your work plan contains one or more capacity indicators that appropriately links to the steps that are either underway or proposed to begin in the associated commitments. Capacity indicators represent the destination of the Tribe's work and therefore the Tribe should express how it will accomplish the tasks necessary to achieve the indicators proposed in its commitments. Moreover, capacity indicators should ideally be placed in the "Measures" section for each component in the work plan. More information on the appropriate use of indicators is found on page 13 of the GAP Guidance. A suite of indicators that the Tribe may consider for inclusion in its work plan is contained in Appendix I of the GAP Guidebook.
4. Please ensure that the total work plan Estimated Component Costs add up to the total approved budget amount indicated in the cover letter, and that the total work plan Estimated Work Years adds up to the total number of approved personnel funded under GAP. I have attached a document entitled "Component Cost and Work Years Guidance" that will help you to correctly identify Component Costs and Work Years to comply with this request.
5. Greening Grants Policy: EPA Region 9 has adopted a Greening Grants Policy which encourages grantees to carry out their EPA grant funded projects in a greener way. Your Project Officer will work with you to determine whether it is feasible to incorporate green practices into your work plan. The Greening Grants Policy includes an attachment which describes many useful green practices.

The policy furthers the objectives of EPA's 2011-15 Strategic Plan. The link to Greening Grant Policy is on the Region 9 Website Homepage, <http://www.epa.gov/region9/funding/greening-grants.html>

Regarding Indirect Costs:

For Tribes that have never received a negotiated IDC:

- If a Tribe has never received a negotiated Indirect Cost (IDC) rate, they may now elect to charge a de minimus rate of 10% of modified total direct costs (MTDC)* and it may be used indefinitely. If chosen, this methodology must be used consistently for all Federal awards until the Tribe chooses to negotiate for a rate.

Please refer to CFR 2, Part 200, Section 200.414 for more information regarding indirect cost rates. This is a change from FY 13 and FY 14 IDC negotiations. Please work with your project officer when budgeting for a 10% IDC.

Budget Comments

Your tentative funding amount is \$68,930. Please revise your budget to reflect this amount in your final application.

Work Plan Comments

Specific work plan comments can be found in GAP Online. General work plan comments are below:

Please ensure each commitment provides **why** the Tribe has proposed each activity, **who** will need to do **what**, **where**, **when** and **how**, to complete proposed activities. This type of information helps quantify the level of effort (FTE and Cost) required to complete commitments, which in turn helps project officers determine if identified costs appear reasonable. Build this type of information into each of your commitment descriptions.

Component Cost and Work Years Guidance

Applications must include estimated component cost and associated work years. At present, Tribes are providing estimated costs that do not, when added together, equal the total budget request and budgeted FTE supplied with the work plan.

Suggested instructions for Tribes:

Estimated Component Costs should, when added together, equal the total budgeted amount. Two suggested ways to arrive at numbers that are equal:

- 1) Evaluate the relative *percentage* of financial resources each work plan task will take, each task being some percentage of 100; multiply that percentage by the total budgeted cost to get the estimated cost per component.

	Component 1	Component 2	Component 3	Total Budget
Percentage of Total:	25%	45%	30%	100%
Cost:	\$ 29,319	\$ 52,774	\$ 35,183	\$ 117,275

- 2) Alternately, as an addendum to calculation of the Total Program Budget, add columns wherein the contribution of each component to the total budget is calculated, and total component budgets across budget categories, applying indirect costs if applicable, personnel costs, and fringe. This “estimate” leans more toward accurate budget numbers.

Category	TOTAL	Component 1	Component 2	Component 3
(FTE)	1.5	0.375	0.6	0.525
Personnel	\$ 55,000	\$ 13,750	\$ 22,000	\$ 19,250
Fringe	\$ 18,150	4,537.50	7,260.00	6,352.50
Supplies	\$ 5,000	500	4100	400
Travel	\$ 5,000	4200	800	0
Equipment	\$ -	0	0	0
Contractual	\$ 15,000	4000	8000	3000
Subtotal	\$ 98,150	\$ 26,988	\$ 42,160	\$ 29,003
Base for Indirect	\$ 83,150	\$ 22,988	\$ 34,160	\$ 26,003
Indirect	\$ 19,125	\$ 5,287	\$ 7,857	\$ 5,981
Total	\$ 117,275	\$ 32,275	\$ 50,017	\$ 34,983

Estimated Component work years should, when added together, equal the total budgeted FTE for the program. One work year is equal to 2,080 personnel hours. A work year is also known as a full time equivalent (FTE), since it is based on a full time job; 40 hours per week * 52 weeks per year = 2,080 hours per year.

Two suggested ways to arrive at numbers that are equal:

- 1) Evaluate the relative *percentage* of staffing resources each work plan component will require, each component being some percentage of 100; multiply the percentage for each component by the total requested FTE to arrive at the estimated FTE per component.

<i>staffing</i>	Component 1	Component 2	Component 3	Total Budget
Percentage of Total:	25%	40%	35%	100%
Cost:	0.38	0.60	0.53	1.50

- 2) Alternately, when calculating the budget in the detailed manner for the Estimated Component Cost, take the FTE applied to each component and use that value to represent the estimated component FTE.

ATTACHMENT

Region 9 Guidance Information for Applicants

<http://www.epa.gov/region9/funding/information.html>

- Omni-Circular under 2 CFR 200 & EPA Regulations under 2 CFR 1500:

EPA has officially adopted the OMB Omni-Circular effective **December 26, 2014**. Specifically, in a [joint interim final rule](#) published in the Federal Register on December 19, 2014 (see 79 Fed. Reg. 76050-76063), EPA adopted the Omni-Circular. This includes adoption of Omni-Circular requirements located at [2 CFR 200](#) along with EPA-specific provisions mandated by statute, regulation or agency policy now codified under [2 CFR 1500](#). OMB's website at <https://cfo.gov/cofar/> is the location for resources regarding the Omni-Circular, including [OMB's Frequently Asked Questions \(FAQ\)](#).

Federal Register:

<http://www.gpo.gov/fdsys/pkg/FR-2014-12-19/pdf/2014-28697.pdf>

2 CFR 200:

<http://www.ecfr.gov/cgi-bin/text-idx?SID=4467ef7edf6418328185fed45270f1f&node=pt2.1.200&rqn=div5>

2 CFR 1500:

<http://www.ecfr.gov/cgi-bin/text-idx?SID=ac772c78043ca73b46f5d168dd3f038f&tpl=/ecfrbrowse/Title02/2chapterXV.tpl>

OMB's FAQ:

<https://cfo.gov/wp-content/uploads/2014/11/2014-11-26-Frequently-Asked-Questions.pdf>

- Interim Financial Assistance Conflict of Interest Policy:

In accordance with the Omni-Circular's Conflict of Interest disclosure requirements under [2 CFR 200.112](#), EPA issued the [Interim Financial Assistance Conflict of Interest Policy](#). Requirements include applicants providing a prominently titled conflict of interest disclosure statement attached to the SF 424, if applicable. This policy applies to all individuals and non-federal entities requesting and receiving EPA financial assistance on or after **December 26, 2014**. (Note: A standard EPA form is not currently available for the COI disclosure requirement since this is an interim policy.)

Interim Policy:

http://www.epa.gov/ogd/epa_interim_financial_assistance_coi_policy.htm

- Submission of Grant Applications via Grants.gov:

Effective **February 17, 2015**, EPA grant applicants must use [Grants.gov](#) to submit their applications. It is highly recommended that EPA applicants complete their registration on Grants.gov now, since the entire process can take up to 30 days to complete. Information located at [Submitting an Application to Grants.gov Apply](#) and [Applicant Resources](#) for Grants.gov will help you get started. Applicants are also encouraged to view a previously recorded [EPA Information Webinar](#) session/ presentation regarding Grants.gov or register for an available session.

Grants.gov support/assistance is available 24 hours a day 7 days a week at 1-800-518-4726 or Support@grants.gov. For International callers, call (606) 545-5035 to speak with a Grants.gov Contact Center representative. Also, the [Region 9 Application Checklist](#) will help ensure your EPA application submitted through Grants.gov is complete.

Guide on Submitting an Application to Grants.gov:

<http://www.epa.gov/ogd/guide/submitting.htm>

Grants.gov Application Resources:

<http://www.grants.gov/web/grants/applicants/applicant-resources.html>

EPA Information Sessions/Webinars:

http://www.epa.gov/ogd/training/grants_gov_information_sessions_for_applicants.htm

Region 9 Application Checklist:

<http://www.epa.gov/region09/funding/pdfs/grantsgov/r9-application-checklist-grantsgov.pdf>

- **Bundling of Grant Application Certifications (for States & Tribes):**

State and Tribal applicants are highly encouraged to submit annually a single set ("bundling") of application certification forms with a cover letter. The letter must indicate the applicable timeframe (usually a federal or state fiscal year) of the certifications for all EPA grant applications received by Region 9 Grants Management Office (GMO) within that period. GMO accepts Adobe format (.pdf) of the letter with applicable signed certification(s) through the electronic mail box:

grantsregion9@epa.gov. Please note that updated forms must be submitted when changes to the responses are required. The following certifications can be bundled:

- ❖ [Standard Form \(SF\) 424B, Assurances for Non-Construction Programs](#)
- ❖ [EPA Form 6600-06, Certification Regarding Lobbying, Certification for Contracts, Grants, Loans and Cooperative Agreements](#)
- ❖ [EPA Form 4700-4, Preaward Compliance Review Report for All Applicants Requesting EPA Financial Assistance](#)

Applicants are highly encouraged to use bundling of their certifications if multiple EPA applications are submitted annually. Bundling can be especially helpful as EPA is transitioning to Grants.gov. Please contact your EPA Grants Specialist for questions regarding bundling.

EPA Application Forms:

<http://www.epa.gov/ogd/forms/forms.htm>

- **Changes to the Minority & Women Business Enterprise (M/WBE) Utilization Reporting Requirement:**

The EPA issued a revised class deviation from **40 CFR 33.502** on **December 4, 2014**, which supersedes the M/WBE reporting requirement specified in the recipient's Notice of Award. The EPA financial assistance recipients are now required to report annually when certain conditions are met to reach a threshold of \$150,000. Please review the current information from [EPA's Small Business Programs](#).

40 CFR 33:

http://www.ecfr.gov/cgi-bin/text-idx?SID=04eada1fb1292e21ecf2434ad7bf3781&tpl=/ecfrbrowse/Title40/40cfr33_main_02.tpl

EPA's Small Business Programs:

http://www.epa.gov/osbp/dbe_reporting.htm

- **Grants Management Training Materials for Tribal Organizations:**

The EPA's Office of Grants and Debarment (OGD) worked with the national Partnership for Environmental Technology Education (NPETE) to develop [training materials for Tribal organizations](#). While OGD is no longer able to offer in-person trainings, the training materials, including the training manuals and webinar recordings, are available for download.

Recipient Training:

http://www.epa.gov/ogd/training/recipient_train.htm

EPA Region 9 - Grants.gov Instructions Guide

(March 2015)

Applications for Federal assistance must be submitted through Grants.gov.

Register with Grants.gov! In order to submit your application using Grants.gov, your organization must be registered with Grants.gov. Please allow four weeks to complete the registration process. Also, please note that you must have a DUNS number and an active SAM.gov registration before registering with Grants.gov. You can find more information about registering at:

<http://www.grants.gov/web/grants/applicants/organization-registration.html>

To Access and Download Grant Application Package go to:

<http://www.grants.gov/web/grants/applicants/download-application-package.html>

1. Funding Opportunity Number (FON).

- A. **Competitive Programs:** Refer to the competitive solicitation for the applicable FON. Applicant will enter this into the "Funding Opportunity Number" field to locate the application package.
- B. **Non-Competitive Discretionary Programs:** Obtain FON from your EPA Point of Contact (POC). Applicant will enter this into the "Funding Opportunity Number" field to locate the application package.
- C. **Continuing Environmental Programs (CEPs):** The list of available CFDA numbers for CEPs have been divided between two FONs. The two FONs used to access the application packages are **EPA-CEP-01** and **EPA-CEP-02**. Refer to the following Attachment to determine which FON your CFDA is published under. Applicant will enter this into the "Funding Opportunity Number" field to locate the packages.

The screenshot shows a web form with three input fields and a button. The first field is labeled 'CFDA Number:' and has a '#' symbol to its right. The second field is labeled 'Funding Opportunity Number:' and has a '(C)' symbol to its right; a red arrow points to this field from the left. The third field is labeled 'Funding Opportunity Competition ID:' and has a '(C)' symbol to its right. Below these fields is a button labeled 'Download Package'.

- 2. **Download the package** associated with CFDA 66.XXX.
- 3. **Complete the Grant Application Package.** Attach the forms and information required by your particular program. **Contact your EPA POC if you have questions about which forms and materials you must submit for your program.**
- 4. **Submit your application.** Go to <http://www.grants.gov/web/grants/applicants/apply-for-grants.html> for more information on this process.
- 5. **Confirm with your EPA POC** that EPA has received your application package. **If for ANY reason you cannot submit your application by the deadline specified, contact your EPA POC immediately.**

For FAQs, User Guides, Checklists, Training and Technical Support, visit the Grants.gov Applicant Resource page at <http://www.grants.gov/web/grants/applicants/applicant-resources.html>

Technical Questions or Issues? Please call (1-800-518-4726) or email (support@grants.gov) the Grants.gov Contact Center (<http://www.grants.gov/web/grants/about/contact-us.html>). Help is available 24 hours a day, 7 days a week.

Grants.gov Instructions Guide

Continuing Environmental Programs (CEPs)
(EPA Mandatory Grant Programs)

ATTACHMENT

CFDAs Under EPA-CEP-01

66.001	Air Pollution Control Program Support
66.032	State Indoor Radon Grants
66.034	Surveys, Studies, Research, Investigations, Demonstrations, and Special Purpose Activities Relating to the Clean Air Act
66.038	Training, Investigations, and Special Purpose Activities of Federally-Recognized Indian Tribes Consistent With the Clean Air Act (CAA), Tribal Sovereignty and the Protection and Management of Air Quality
66.040	State Clean Diesel Grant Program This program contains Recovery Act funding.
66.042	Temporally Integrated Monitoring of Ecosystems (TIME) and Long-Term Monitoring (LTM) Program
66.121	Puget Sound Protection and Restoration: Tribal Implementation Assistance Program
66.124	Coastal Wetlands Planning Protection and Restoration Act
66.125	Lake Pontchartrain Basin Restoration Program (PRP)
66.202	Congressionally Mandated Projects
66.418	Construction Grants for Wastewater Treatment Works This program contains Recovery Act funding.
66.419	Water Pollution Control State, Interstate, and Tribal Program Support
66.432	State Public Water System Supervision
66.433	State Underground Water Source Protection
66.437	Long Island Sound Program
66.454	Water Quality Management Planning This program contains Recovery Act funding.
66.456	National Estuary Program
66.458	Capitalization Grants for Clean Water State Revolving Funds This program contains Recovery Act funding.
66.460	Nonpoint Source Implementation Grants
66.466	Chesapeake Bay Program
66.468	Capitalization Grants for Drinking Water State Revolving Funds This program contains Recovery Act funding.
66.469	Great Lakes Program
66.472	Beach Monitoring and Notification Program Implementation Grants
66.473	Direct Implementation Tribal Cooperative Agreements
66.481	Lake Champlain Basin Program
66.482	Disaster Relief Appropriations Act (DRAA) Hurricane Sandy Capitalization Grants For Clean Water State Revolving Funds
66.483	Disaster Relief Appropriations Act (DRAA) Hurricane Sandy Capitalization Grants for Drinking Water State Revolving Funds
66.508	Senior Environmental Employment Program This program contains Recovery Act funding.
66.517	Regional Applied Research Efforts (RARE)
66.518	State Senior Environmental Employment Program
66.600	Environmental Protection Consolidated Grants for the Insular Areas - Program Support
66.605	Performance Partnership Grants

CFDAs Under EPA-CEP-02

66.700	Consolidated Pesticide Enforcement Cooperative Agreements
66.701	Toxic Substances Compliance Monitoring Cooperative Agreements
66.707	TSCA Title IV State Lead Grants Certification of Lead-Based Paint Professionals
66.714	Regional Agricultural IPM Grants
66.801	Hazardous Waste Management State Program Support
66.802	Superfund State, Political Subdivision, and Indian Tribe Site-Specific Cooperative Agreements This program contains Recovery Act funding.
66.804	Underground Storage Tank Prevention, Detection and Compliance Program
66.805	Leaking Underground Storage Tank Trust Fund Corrective Action Program This program contains Recovery Act funding.
66.808	Solid Waste Management Assistance Grants
66.809	Superfund State and Indian Tribe Core Program Cooperative Agreements
66.817	State and Tribal Response Program Grants
66.819	Disaster Relief Appropriations Act (DRAA) Hurricane Sandy Leaking Underground Storage Tank Trust Fund Corrective Action Program
66.926	Indian Environmental General Assistance Program (GAP)
66.931	International Financial Assistance Projects Sponsored by the Office of International and Tribal Affairs